



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DEC 22 2017

Mr. Danilo Dragoni
Chief, Bureau of Air Quality Planning
Nevada Division of Environmental Protection
901. South Stewart Street, Suite 4001
Carson City, Nevada 89701

Dear Mr. Dragoni:

This letter responds to several of the Nevada Division of Environmental Protection's (NDEP's) submittals requesting that the Environmental Protection Agency (EPA) concur with NDEP's request to exclude data associated with exceptional event claims. NDEP submitted demonstrations on November 29, 2016, May 31, 2017, and September 18, 2017, for O₃ and PM_{2.5} data influenced by wildfires and stratospheric O₃ intrusion in 2014, 2015, and 2016. NDEP has determined that these events caused exceedances of the 2015 8-hour O₃ NAAQS and the 2006 24-hour PM_{2.5} NAAQS at monitoring stations in Fallon, Fernley, Carson City, and Gardnerville Ranchos. A table listing the submittals and relevant data requested for exclusion is enclosed. The EPA acknowledges that NDEP submitted these demonstrations in accordance with 40 CFR 50.14(c).

In 2016, the EPA revised the Exceptional Events Rule (EER) found in sections 40 CFR 50.14 and 51.930. The 2016 rule revisions at 40 CFR 50.14(a)(1)(i) limit the applicability of the EER to NAAQS exceedances or violations which have relevance to specific regulatory determinations by the EPA. The PM_{2.5} and O₃ exceedances addressed in these demonstrations do not currently have regulatory significance and will therefore not be reviewed at this time. The EPA will retain the NDEP demonstrations for future consideration should any of the data on which the EPA is deferring action at this time become significant for a future regulatory determination.

If you have any questions regarding this letter, or wish to discuss this matter further, please feel free to contact me at (415) 947-4134 or Anna Mebust at (415) 972-3265.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gwen Yoshimura", is written over a horizontal line.

Gwen Yoshimura, Manager
Air Quality Analysis Office

Enclosure

cc (via email): Sheryl Fontaine, NDEP

Enclosure: NDEP Exceptional Event Submittals Being Deferred

Submittal Date	11/29/2016	11/29/2016	5/31/2017	5/31/2017	9/18/2017	9/18/2017
Event type	Stratospheric Intrusion	Wildfire	Wildfire	Wildfire	Wildfire	Wildfire
NAAQS	2015 8-hr O ₃	2015 8-hr O ₃	2015 8-hr O ₃	2015 8-hr O ₃	2006 24-hr PM _{2.5}	2006 24-hr PM _{2.5}
Monitor	Great Basin National Park	Fallon	Fernley	Fallon	Carson City	Gardnerville Ranchos
AQS ID	32-033-0101	32-001-0002	32-019-0006	32-001-0002	32-510-0020	32-005-0007
Event Date(s)	6/8/2015	8/20/2015 8/21/2015	7/3/2016 7/4/2016	8/28/2016	9/18/2014 9/22/2014 9/23/2014	9/18/2014 9/19/2014 9/22/2014
Concentrations: 8-hr (O₃) or 24-hr (PM_{2.5})	0.072 ppm	0.076 ppm 0.080 ppm	0.071 ppm 0.070 ppm	0.073 ppm	44.4 µg/m ³ 76.6 µg/m ³ 51.2 µg/m ³	37.3 µg/m ³ 40.5 µg/m ³ 47.5 µg/m ³